UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

JOHN NEUBERT, on behalf of himself and all others similarly situated,	
Plaintiff,	Case No. 5:24-cv-00831-JFL
v.	
LEHIGH UNIVERSITY,	
Defendant.	

PLAINTIFF'S MOTION FOR AWARD OF ATTORNEYS'
FEES, COSTS, AND CASE CONTRIBUTION AWARD
TO SETTLEMENT CLASS REPRESENTATIVE

Through undersigned counsel, Plaintiff John Neubert ("Plaintiff") respectfully moves this Court for approval of reasonable attorneys' fees, costs, and case contribution award to Settlement Class Representative pursuant to the proposed Settlement Agreement and Release that this Court preliminarily approved in its Order dated January 13, 2025. Plaintiff moves for an award of attorneys' fees in the amount of $583,275 and litigation expenses in the amount of $8,174.26 with such amounts to be paid from the Settlement Fund in accordance with the terms of the Settlement. Plaintiff additionally moves for a Case Contribution Award to the Settlement Class Representative in the amount of $2,500.00. In further support of this Motion, Plaintiff refers the Court to the attached memorandum of law and the Declaration of Nicholas A. Colella.

Dated: March 31, 2025

Respectfully submitted,

/s/ Nicholas A. Colella
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CERTIFICATE OF SERVICE

I hereby certify that, on March 31, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Eastern District of Pennsylvania by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Nicholas A. Colella
Nicholas A. Colella